

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division**

GILBERT JAMES, *et al.*, on behalf of
themselves and all others similarly situated

Plaintiffs,

v.

EXPERIAN INFORMATION SOLUTIONS, INC.

Defendant.

Civil No. 3:12cv902

**PLAINTIFF GILBERT JAMES'S FIRST REQUESTS FOR PRODUCTION
OF DOCUMENTS TO DEFENDANT EXPERIAN INFORMATION SOLUTIONS, INC.**

Pursuant to the Federal Rules of Civil Procedure and the Local Rules for the Eastern District of Virginia, Plaintiff Gilbert James, by counsel, propounds the following Requests for Production of Documents to the Defendant, Experian Information Solutions, Inc. ("Experian" or "Defendant"), to be answered under oath within the time prescribed by the Federal Rules of Civil Procedure and the Local Rules of the United States District Court for the Eastern District of Virginia.

DEFINITIONS AND INSTRUCTIONS

Plaintiff incorporates, by reference, the definitions and instructions from Plaintiff Gilbert James's First Set of Interrogatories directed to the Defendant.

REQUESTS FOR PRODUCTION OF DOCUMENTS

PLEASE TAKE NOTICE, that pursuant to Federal Rule of Civil Procedure 34, Plaintiff Gilbert James, by counsel, requests that you produce in ORIGINAL form for the purposes of inspection, copying, and/or testing, the documents described below. Such documents are to be

produced at Plaintiff's counsel's office within the time prescribed by the Federal Rules of Civil Procedure and the Local Rules of the Eastern District of Virginia.

1. Please produce all documents identified in, referred to, or regarding any of your answers to all Interrogatories propounded by the Plaintiffs.

RESPONSE:

2. Please produce all documents that support each of your affirmative defenses set forth in your Answer.

RESPONSE:

3. Please produce all exhibits you intend to introduce at the class certification hearing and/or at trial.

RESPONSE:

4. Please produce all materials used by you since January 1, 2007 that pertain to and/or describe your procedures or policy relating to consumer disputes under 15 U.S.C. § 1681i, including, but not limited to, all versions of the participant's Guide Form 2000 to the present.

RESPONSE:

5. Please produce any listing, concordance, or definition of any codes, response codes, shorthand, or abbreviations appearing in any of the documents that you produce.

RESPONSE:

6. Please produce any list generated by you—and specifically by any writing department within your organization—of manuals or guides produced or published by or within your organization.

RESPONSE:

7. Please produce all documents describing or identifying the means or manner in which information pertaining to a consumer, such as credit accounts, personal identifying information, public record information, etc. is matched to a specific consumer.

RESPONSE:

8. Please produce terminal audit trails as of the date of access of each of the Plaintiffs' consumer reports by any of your subscribers who have received the Plaintiffs' consumer report since January 1, 2007.

RESPONSE:

9. Please produce any budgets or projections prepared within the preceding five years that allocate resources or expenditures to the processing or conducting of reinvestigations under 15 U.S.C. § 1681i.

RESPONSE:

10. Please produce any programs under which any of your employees and/or other third parties are provided any bonus, pay, or other incentive relating to the processing or reinvestigations of consumer disputes, including all contracts with schedules/exhibits between you and any third party or subsidiary that processes consumer disputes in Chile or elsewhere.

RESPONSE:

11. Please produce any manuals, videotapes, bulletins, or notices provided to your employees or third parties that describe their contractual or statutory duties relating to the investigation of inaccurate or incomplete credit information.

RESPONSE:

12. Please produce your statistics compiled on an annual basis regarding the total number of disputes you received and the total number of reinvestigations conducted for the five years preceding the filing of this Complaint (including all related statistical fields and other maintained or available information).

RESPONSE:

13. Please produce each and every archived report you maintain regarding the Plaintiffs or any of their personal identifiers. This request *includes* the full long admin report available, as well as all other documents that you agreed to produce in *Scroggins v. Trans Union, LLC, et al.*, Civil No. 3:07cv486 (E.D. Va.).

RESPONSE:

14. Please produce copies of any and all documents which contain any data about reliability assessments, audits, reports, or studies of consumer credit data provided to you by your subscribers or any grouping of subscribers in the years: 2007, 2008, 2009, 2010, 2011, and 2013. Include, as means of example only and without limitation, all communications and other exchanged documents regarding the PERC “study” on credit reporting and reviews and financial analysis of the costs and benefits of using an NCAC outsource agent in Chile or elsewhere.

RESPONSE:

15. Please produce copies of any statements you have taken or received from any third person in any way connected with the allegations contained in this lawsuit, including in the *Menton v. Experian Corp.* Civil No. 02-4687 (S.D.N.Y.) case or any case thereafter.

RESPONSE:

16. Please produce the personnel file(s) of each employee or agent who has ever handled or processed a dispute or conducted an investigation or reinvestigation of any information ever placed in any of the Plaintiffs’ files.

RESPONSE:

17. Please produce a copy of each and every screen and file in your consumer credit database that in any way references each of the Plaintiffs’ and/or their personal identifiers.

RESPONSE:

18. Please produce all dispute letters sent to you by a consumer with a Virginia address since January 2011.

RESPONSE:

19. Please produce any document that details and describes the organizational structure of Experian and any of its related affiliate or subsidiary entities.

RESPONSE:

20. Please produce each Consumer Dispute Verification or Automated Consumer Dispute Verification [CDV or ACDV] communication or other dispute communication you generated, used, or received which regarded the Plaintiffs or any of their personal identifiers.

RESPONSE:

21. Please produce each Universal Data Form or Automated Universal Data Form [UDF or AUDF] communication you have ever received which regarded the Plaintiffs or any of their personal identifiers.

RESPONSE:

22. Please produce your annual report issued for all of the fiscal or calendar years 2007, 2008, 2009, 2010, 2011, and 2012. In lieu of producing such documents, you may produce a written stipulation of the amount of your Net Worth as of January 1, 2013.

RESPONSE:

23. Please produce all documents that describe how any agent (including the agent and any of its employees who worked on tasks regarding any of the Plaintiffs' files) who at all handled, processed, or investigated any of the Plaintiffs' consumer disputes is paid, including all contracts, instructions, audits, and incentive programs.

RESPONSE:

24. Please produce all records of communications between Experian and any third party regarding this case, the Plaintiffs, or any of their personal information, including all documents, records of telephonic or electronic communications, log books, or other records.

RESPONSE:

25. Please produce all records of communications between each of the Plaintiffs and Experian, including all documents, records of telephonic or electronic communications, log books, or other records.

RESPONSE:

26. Please produce all consumer complaints (lawsuits, disputes, or otherwise) you have received in the last five years made or brought against you by consumers based on your failure to properly investigate a tradeline.

RESPONSE:

27. Please produce a copy of all of Experian's responses to any Interrogatory, Request for Production of Documents, or Request for Admissions, as well as all deposition transcripts related to the *Jose Luis Calderon v. Experian Information Solutions, Inc.*, Civil No. 1:11cv386 (D. Idaho) lawsuit.

RESPONSE:

28. Please produce a copy of all letters, notices, or other document, whether sent electronically or hard copy, provided to any consumer in the five years preceding the filing of this Complaint in which additional identifying information was requested before you would process their dispute.

RESPONSE:

29. Please produce all written communications received from any consumer on or after December 28, 2007 for whom a disclosure log shows that on or after December 28, 2007, Experian responded to that communication and mailed a letter type number 066, or one described in Experian's records as or with a notation substantially similar to "Letter Paragraphs=Not mine or non-specific disp — no SSN (066)".

RESPONSE:

30. Please produce all documents, including training manuals, memos, emails, or other documents describing your procedures, policies, or other company rules relating to the processing of consumer disputes and including, but not limited to, the refusal to process a dispute when specific personal identifying information is not provided.

RESPONSE:

31. Please produce all emails which reference or relate in any way to this case or which contain any of the following phrases: “Menton”, “identification”, “identifying information”, or “utility bill”.

RESPONSE:

32. Please produce all documents and/or invoices that reflect the amounts that you charged to any third party for the sale of any of the Plaintiffs’ consumer reports since 2007.

RESPONSE:

33. Please produce all documents concerning the minimum identifying information (e.g. name, date of birth, address, social security number, etc.) that you require a third party provide to you before you sell any consumer report to that third party, including all instruction manuals or correspondence that you have provided to new subscribers since 2007.

RESPONSE:

34. Please produce any document, screenshot, or other material containing the exact identifying information that any third party provided to you in order to purchase a consumer report regarding each of the named Plaintiffs.

RESPONSE:

35. Please produce all documents concerning the minimum identifying information (e.g. name, date of birth, address, social security number, etc.) that you require a third party furnisher provide to you before you will include information furnished from that third party on a specific consumer report.

RESPONSE:

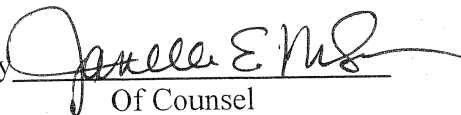
36. Please produce any document, screenshot, or other material containing the exact identifying information that any third party furnisher provided to you before you included information furnished from that third party into the credit file of any of the named Plaintiffs.

RESPONSE:

37. Please produce any and all documents in your possession or control, which you claim or believe are relevant in any way to the subject matter of this lawsuit.

RESPONSE:

Respectfully submitted,
GILBERT JAMES

By 
Of Counsel

Matthew J. Erausquin, VSB No. 65434
Janelle E. Mason, VSB No. 82389
Casey S. Nash, VSB No. 84261
Counsel for the Plaintiffs
CONSUMER LITIGATION ASSOCIATES, P.C.
1800 Diagonal Road, Suite 600
Alexandria, VA 22314

Tel: (703) 273-7770
Fax: (888) 892-3512
matt@clalegal.com
janelle@clalegal.com
casey@clalegal.com

Leonard A. Bennett, VSB No. 37523
Counsel for the Plaintiffs
CONSUMER LITIGATION ASSOCIATES, P.C.
763 J. Clyde Morris Blvd., Suite 1-A
Newport News, VA 23601
Tel: (757) 930-3660
Fax: (757) 930-3662
lenbennett@clalegal.com

CERTIFICATE OF SERVICE

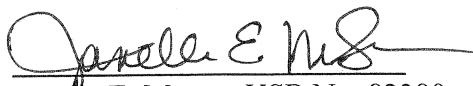
I hereby certify that on this 18th day of April, 2013, a true and correct copy of the foregoing was sent via electronic mail and First Class Mail to the following counsel of record:

Edward M. Wenger, Esq.
Jones Day (DC)
51 Louisiana Ave NW
Washington, DC 20001
Tel: (202) 879-3466
Fax: (202) 626-1700
emwenger@jonesday.com

Joseph W. Clark, Esq.
Jones Day (DC)
51 Louisiana Ave NW
Washington, DC 20001
Tel: (202) 879-3939
Fax: (202) 626-1700
jwclark@jonesday.com

Daniel J. McLoon, Esq.
Jones Day (CA)
555 S Flower Street, 50th Floor
Los Angeles, CA 90071
Tel: (231) 243-2580
Fax: (231) 243-2539
djmcloon@jonesday.com

Counsel for the Defendant



Janelle E. Mason, VSB No. 82389
CONSUMER LITIGATION ASSOCIATES, P.C.
1800 Diagonal Road, Suite 600
Alexandria, VA 22314
Tel: 703-273-7770
Fax: 888-892-3512
janelle@clalegal.com
Counsel for the Plaintiffs